

*This amendment was based on SMC employment of 700 people. We do not find any detailed analysis of the impacts of increasing production limits. The social and economic effects presented in Section 4.5 indicate effects from 12/31/96 population estimates to population projections associated with SMC employment of 700. If production increases to 3,000 to 5,000 tons per day, will the social and economic effects presented in this DEIS be valid? A detailed analysis of social and economic effects of increasing production limits, independent of SMC's consultant work, should be included in the final EIS. (46s)*

Response: The removal of the production limit considered in this analysis would not result in unlimited production by SMC. Disturbances under SMC's operations would still be limited to the total acreage approved in previous decisions in combination with DEQ and CNF's decisions on this analysis. Even if the agencies decide to eliminate the current 2,000 tpd production limit, SMC's production effectively would be limited to about 5,000 tpd because SMC probably cannot install enough equipment to handle long-term production above 5,000 tpd within the approved disturbance footprint. To increase long-term production above 5,000 tpd, SMC would have to get the approval of DEQ and CNF to increase the amount of land disturbed for the Stillwater Mine. This approval would require another MEPA/NEPA analysis of effects.

Increases in production above the 3,000 tpd average, are not expected to cause socioeconomic effects different than those described in this EIS. SMC maintains that increases in production above 3,000 tpd probably would be possible only with increases in mechanized mining, not increases in personnel. Consequently, higher production levels are unlikely to result in additional employees above 700.

If SMC's mineral employment does increase or is projected to increase for any reason and the increase exceeds thresholds defined in the 1998 amendment to SMC's Hard Rock Impact Plan, then the Plan would have to be modified to address potential socioeconomic effects. Based on employment, the 1998 Plan Amendment establishes two thresholds for modification. The 1998 Plan Amendment may be modified if in-migrating mineral employment in any affected unit of local government differs by more than 15 percent from the level projected in the amendment. Also, an affected unit of local government may petition for an amendment to the Hard Rock Impact Plan if in-migrating employment at the SMC mineral development is forecast to increase or decrease from the levels projected in the 1998 amendment by at least 75 employees.

6. 4.5.1.2 All Action Alternatives B, C, D: I am somewhat confused in this section as to how many in-migrating employees and their dependants are anticipated: 4.5.1.2.1 states 18 employees will in-migrate, 4.5.1.2.2 talks about an increase of 240 workers from the projected workforce of 460 in the Hard Rock Impact Plan, and 4.5.1.2.5